

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PHASE ONE NETWORK, INC.,

Plaintiff,

-against-

YE f/k/a KANYE WEST d/b/a “Yeezy Tech”,  
ALEX KLEIN, KANO COMPUTING LIMITED,  
STEMPLAYER, LTD, GETTING OUT OUR  
DREAMS II, LLC, G.O.O.D. MUSIC, DEF JAM  
RECORDINGS, and UMG RECORDINGS, INC.,

Defendants.

Civil Action No. 22-cv-9511

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Poupa Jenny Marashi, Esq. dated June 23, 2023, and exhibits annexed thereto, and the accompanying Memorandum of Law, Defendants Ye, Getting Out Our Dreams II, LLC, and Getting Out Our Dreams Inc. shall move this Court, before the Honorable John P. Cronan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, Courtroom 12D, on a date and time to be directed by the Court, for an Order dismissing in its entirety with prejudice the Complaint of Plaintiff Phase One for lack of standing under Rule 12(b)(1), failure to state a claim for relief under Rules 8(a) and 12(b)(6), and failure to join necessary parties under 12(b)(7) of the Federal Rules of Civil Procedure. The reasons and grounds for Defendants' motion are more fully set forth in the accompanying Memorandum of Law in support of this motion.

Dated: Bronx, New York  
June 23, 2023

Marashi Legal



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